Case: 1:13-cr-00342 Document #: 1 Filed: 04/26/13 Page 1 of 2 Page 1 #:1

APR 2 6 2013

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THOMAS G BRUTON CLERK, US DISTRICT COURT

UNITED STATES OF AMERICA)	No. 13 CR 342
v.)	
)	Violation: Title 29, United States
BONNIE S. HERATY)	Code, Section 439(c)

The UNITED STATES ATTORNEY charges: MAGISTI

MAGISTRATE JUDGE KEYS

- 1. At times material to this information:
- a. The Maritime Trades Department Greater Chicago Area Port Council (the "Union") was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Section 402(i) and (j).
- b. Defendant BONNIE S. HERATY ("HERATY") was employed continuously as the Union's Treasurer from in or around 1996 until in or around October 2010. As Treasurer of the Union, HERATY had access to Union funds in a Union checking account at Charter One Bank (the "Union checking account"). HERATY had authority to issue checks drawn upon the Union checking account, but only on behalf of the Union and for Union business. HERATY was not allowed to withdraw funds from the Union checking account for personal use or to pay her personal expenses.

Case: 1:13-cr-00342 Document #: 1 Filed: 04/26/13 Page 2 of 2 PageID #:2

2. On or about March 2, 2010, at Joliet, in the Northern District of Illinois, Eastern Division, and elsewhere,

BONNIE S. HERATY,

defendant herein, did willfully make a false entry in a book, record, report, and statement required to be kept by Title 29, United States Code, Section 436, in that defendant HERATY made a false entry on the memo section of Union check number 616, which HERATY drew and made payable to HERATY in the amount of \$450, namely, a false representation that the payment was a reimbursement to HERATY for expenses that HERATY paid with her own funds on behalf of the Union;

In violation of Title 29, United States Code, Section 439(c).

Gay S. Shufur G/L UNITED STATES ATTORNEY